1 Joseph W. Cotchett Mark Molumphy COTCHETT, PITRE & McCARTHY 2 840 Malcolm Road, Suite 200 3 Burlingame, California 94010 (650) 697-6000 Telephone: 4 Facsimile: (650) 697-0577 5 Stanley M. Grossman Patrick V. Dahlstrom Marc L. Gross Joshua B. Silverman Jeremy A. Lieberman 6 POMERANTZ HAUDEK BLOCK POMÉRANTZ HAUDEK BLOCK GROSSMAN & GROSS LLP GROSSMAN & GROSS LLP One North LaSalle Street 100 Park Avenue **Suite 2225** 8 New York, New York 10017-5516 Chicago, Illinois 60602 Telephone: (212) 661-1100 Telephone: (312) 377-1181 Facsimile: (212) 661-8665 Facsimile: (312) 377-1184 Attorneys for Plaintiff CLAL Finance Batucha Investment Management Ltd. 10 And Direct Investment House (Providence Funds) Ltd. 11 UNITED STATES DISTRICT COURT 12 NORTHERN DISTRICT OF CALIFORNIA 13 14 IN RE VERIFONE HOLDINGS, INC. 15 SECURITIES LITIGATION. No. C 07-06140 MHP 16 17 18 DECLARATION OF YOSSI ALHARAL IN SUPPORT OF 19 CLAL FINANCE BATUCHA INVESTMENT MANAGEMENT, LTD'S MOTION FOR RECONSIDERATION OF THE AUGUST 22, 2008 ORDER 20 21 22 23 24 25 26 27 DECLARATION OF YOSSI ALHARAL IN SUPPORT OF CLAL FINANCE BATUCHA INVESTMENT 28 MANAGEMENT, LTD.'S MOTION FOR RECONSIDERATION OF THE AUGUST 22, 2008 ORDER

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- I, Yossi Alharal, declare and state as follows:
- 1. I submit this declaration in support of CLAL Finance Batucha Investment Management, Ltd.'s ("CLAL") Motion for Reconsideration of the Court' Order Appointing Lead Plaintiff in the above-referenced action dated August 22, 2008 ("August 22, 2008 Order" or "Order") (Docket Entry No. 155).
- 2. I am the Chief Executive Officer ("CEO") of CLAL. Prior to my appointment as CEO, I served as CLAL's Chief Operating Officer ("COO"). As CEO and COO, I have come to know the trading operations of CLAL with respect to investments in Verifone Holdings, Inc. ("Verifone") common stock.
- 3. On March 17, 2008, I was present before the Court during the oral argument on the competing motions for Lead Plaintiff in this action. I was introduced to the Court and assisted counsel in answering questions posed by the Court regarding CLAL's Lead Plaintiff motion, in general, and CLAL's trading and portfolio, specifically.
- 4. None of the trades in Verifone common stock for Account 248004, referenced in the Order at page 15, were executed as part of a "day trading" strategy or executed by a day trader.
- None of the trades in Verifone common stock in any of the accounts submitted by 5. CLAL in support of its motion for appointment as lead counsel were executed as part of a "day trading" strategy or executed by a "day trader." Indeed, CLAL did not employ any "day trading" strategies for accounts that purchased or sold Verifone common stock during the Class Period.
- All of the transactions by CLAL in Verifone common stock during the Class 6. Period were made in consideration of the price of Verifone common stock and Verifone's public DECLARATION OF YOSSI ALHARAL IN SUPPORT OF CLAL FINANCE BATUCHA INVESTMENT MANAGEMENT, LTD.'S MOTION FOR RECONSIDERATION OF THE AUGUST 22, 2008 ORDER

statements and filings made to the United States Securities and Exchange Commission, as well as analyst reports covering Verifone.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this \_\_\_\_\_\_ day of September, 2008, in Tel Aviv, Israel.

Yossi Alharal

Chief Executive Officer

CLAL Finance Batucha Investment Management, Ltd.

DECLARATION OF YOSSI ALHARAL IN SUPPORT OF CLAL FINANCE BATUCHA INVESTMENT MANAGEMENT, LTD.'S MOTION FOR RECONSIDERATION OF THE AUGUST 22, 2008 ORDER